

**REDACTED - FOR PUBLIC INSPECTION**

July 1, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

ATTENTION: WIRELINE COMPETITION BUREAU

RE: Form 481 ETC filing pursuant to Sections 54.313 and 54.422  
SAC 381622, ND, Moore & Liberty Telephone Company  
*Connect America Fund WC Dockets 10-90, 11-42 and 14-58*

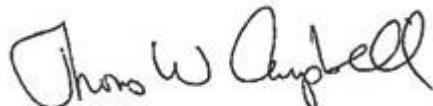
Dear Ms. Dortch:

Pursuant to Sections 54.313 and 54.422 of Commission's Rules, Moore & Liberty Telephone Company, ND, SAC 381622 is filing its Form 481 High Cost and Low-Income Annual Report.

Moore & Liberty Telephone Company seeks confidential treatment under the Protective Order in this proceeding for Section 54.313(f)(2) financial information in the 481 filing <sup>1</sup> and for Section 54.202(a) 5 Year Service Quality Improvement Plan annual progress report and service area progress mapping information required as part of the 481 filing pursuant to the Request for Confidential Treatment attached to this filing. Pursuant to the Protective Order, one copy of the confidential document and two copies of the redacted version are provided. The Redacted version is also being filed on the Electronic Comment Filing System.

Please address any correspondence regarding this transmittal to the attention of Tom Campbell at the following address, e-mail or telephone number.

Sincerely,



Tom Campbell  
Telecommunications Consultant  
[tcampbell@otcpas.com](mailto:tcampbell@otcpas.com)  
651-621-8511 (v)  
651-483-2467 (f)

Enclosures

CC: Mr. Charles Tyler, FCC Telecommunications Access Policy Division (two copies confidential)

<sup>1</sup> See Protective Order 27, WC Docket Nos. 10-90 et al, Rec 14231 rel. November 16 ("Order")

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
Lifeline and Link Up Reform	)	WC Docket No. 11-42
	)	
ETC Annual Reports and Certifications	)	WC Docket No. 14-58

**REQUEST FOR CONFIDENTIAL TREATMENT**

Moore & Liberty Telephone Company, SAC 381622, (“the company”) requests that the portion of its Form 481 pertaining to the 5-Year Service Quality Improvement Plan Progress Report and Service Exchange Mapping data be granted confidential, non-public treatment pursuant to Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457, 0.459, and related provisions of the Freedom of Information Act (“FOIA”), including 5 U.S.C. § 552(b)(4) (“Exemption 4”). Form 481 contains information regarding the company’s Section 54.202(a) 5- Year Service Quality Improvement Plan including capital expenditures and operating expenses. Release of such information would supply a roadmap to competitors regarding confidential build out plans and study area demographics. In addition, the document contains confidential information that is not customarily disclosed to the public or made available within the telecommunications industry. Information in support of the company’s request for confidential treatment pursuant to Section 0.459(b) of the Commission’s Rules, 47 C.F.R. § 0.459(b), is provided below.

**I. MOORE & LIBERTY TELEPHONE COMPANY’S FORM 481 SATISFIES THE REQUIREMENTS OF § 0.459 OF THE COMMISSION’S RULES**

The material for which the company seeks confidentiality falls squarely within the requirements of Section 0.459 of the Commission’s rules. As demonstrated below, the company has satisfied each of the elements of Section 0.459, and disclosure of this information would result in competitive harm to the company.

**(1) Identification of the specific information for which confidential treatment is sought.** The company requests confidential treatment for the portion of Form 481 required by 47 C.F.R. § 54.313 related to the Section 54.202(a) 5- Year Service Quality Improvement Plan. The information bears the legend “Confidential Financial Information. The specific information falls into the categories of: 1. Capital Expenditures, 2. Operating Expenses and 3. Area Demographics

**(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.** The information is required to be produced annually by 47 C.F.R. § 54.313. The proceedings are WC Docket No. 10-90 and WC Docket No. 11-42. The documents will also be submitted in WC Docket NO. 14-58

**(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.** The information for which confidentiality is requested is “financial” and commercial<sup>1</sup> in nature. The information is “confidential” in that it “would customarily not be released to the public.”<sup>2</sup> The courts have elaborated that material “is ‘confidential’ . . . if disclosure of the information is likely to have either the following effects: (1) to impair the government’s ability to obtain necessary information in the future; or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained.”<sup>3</sup> Both of the considerations apply in this instance, as further explained in point (5) below.

**(4) Explanation of the degree to which the information concerns a service that is subject to competition.** All of the services provided by the company are subject to intense existing or potential competition.

<sup>1</sup> See *Board of Trade of the City of Chicago v. Commodity Futures Trading Comm’n*, 627 F.2d 392, 403 & n.78 (D.C. Cir. 1980) (courts have given the terms “commercial” and “financial, as used in Section 552(b)(4), their ordinary meanings).

<sup>2</sup> *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 873 (D.C. Cir. 1992) (citing the Senate Committee Report).

<sup>3</sup> *Nat'l Parks and Conservation Ass'n v. Morton*, 498 f.2d 764, 770 (D.C. Cir. 1974) (footnote omitted); see also *Critical Mass Energy*, 975 F.2d at 873.

**(5) Explanation of how disclosure of the information could result in substantial competitive harm.** If the information were publicly available, it would supply competitors with financial information not ordinarily available to the public. Specifically, rural telephone service has historically lent itself to “cherry picking” by competitors that choose to only serve low cost areas. Release of this specific build out and operating expense information would allow competitors to gain an unfair advantage.

**(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure.** The information for which the company seeks confidential treatment is information that the company does not customarily release to the public. The company also limits the internal circulation of this information to only those with a need to know.

Consistent with 47 C.F.R. § 0.459(a), the items for which confidentiality is requested are being submitted with, and are covered by, this request. This request for confidentiality - as well as the documents subject to this request - are being filed in hard copy and/or electronic copy.

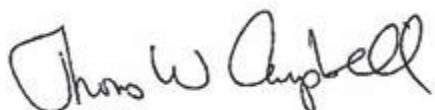
**(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.** The documents and information for which confidentiality is sought are not made available to the public and have not been disclosed to third parties, except to those entities identified in 47 C.F.R. § 54.313(i). For those disclosures, the company has requested confidential treatment by the entities for the same information.

**(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure.** Given the sensitive nature of the information for which confidentiality is requested, the prospect of serious competitive harm, the company requests that confidential treatment apply indefinitely.

## **II. CONCLUSION**

For these reasons, pursuant to Sections 0.457 and 0.459 of the Commission's Rules, the company requests that the portion of Form 481 relating to the Section 54.202(a) 5 - Year Service Quality Improvement Plan be treated as confidential under the Commission's rules and precedent and withheld in their entirety from public inspection, and that any distribution of them within the Commission should be limited to a "need to know" basis. In the event that any person or entity requests access to the documents or seeks to make any or all of them part of the public record, the company requests to be notified immediately so that it can oppose such request or take other action as necessary to safeguard its interests and the interests of consumers.

Sincerely,



Tom Campbell

Telecommunications Consultant

[tcampbell@otcpas.com](mailto:tcampbell@otcpas.com)

651-621-8511 (v)

651-483-2467 (f)

<010> Study Area Code	381622
<015> Study Area Name	MOORE & LIBERTY TEL
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Tom Campbell
<035> Contact Telephone Number: Number of the person identified in data line <030>	6516218511 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	tcampbell@otcpas.com

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>		<b>54.313</b> <b>Completion Required</b>	<b>54.422</b> <b>Completion Required</b>
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <small>check box if no outages to report</small>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)		(attach descriptive document)	
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)		(attach descriptive document)	
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)			
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance		(check to indicate certification)	
381622nd510.pdf		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>		(attached descriptive document)	
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations		(check to indicate certification)	
381622nd610.pdf		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>		(attached descriptive document)	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<700> Company Price Offerings (voice)		(complete attached worksheet)	
<710> Company Price Offerings (broadband)		(complete attached worksheet)	
<800> Operating Companies and Affiliates		(complete attached worksheet)	
<900> Tribal Land Offerings (Y/N)?	<input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	
<1000> Voice Services Rate Comparability Certification	Yes		
381622nd1010.pdf		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>		(attach descriptive document)	
		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	
<1110>		(complete attached worksheet)	
<1200> Terms and Condition for Lifeline Customers		(complete attached worksheet)	
<b>Price Cap Carriers, Proceed to <u>Price Cap Additional Documentation Worksheet</u></b>			
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>			
<2000>		(check to indicate certification)	
<2005>		(complete attached worksheet)	
<b>Rate of Return Carriers, Proceed to <u>ROR Additional Documentation Worksheet</u></b>			
<3000>		(check to indicate certification)	
<3005>		(complete attached worksheet)	

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	381622
<015>	Study Area Name	MOORE & LIBERTY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	t.campbell@octopus.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>
<110>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input checked="" type="radio"/> <input type="radio"/>
<111>		

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

381622nd112.docx, 381622nd112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- |       |  |     |
|-------|--|-----|
| <113> | Maps detailing progress towards meeting plan targets   | Yes |
| <114> | Report how much universal service (USF) support was received   | Yes |
| <115> | How much (USF) was used to improve service quality and how support was used to improve service coverage  | Yes |
| <116> | How much (USF) was used to improve service coverage and how support was used to improve service coverage | Yes |
| <117> | How much (USF) was used to improve service capacity and how support was used to improve service capacity | Yes |
| <118> | Provide an explanation of network improvement targets not met in the prior calendar year.                | Yes |

**(200) Service Outage Reporting (Voice)  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<01D>	Study Area Code	381622
<01S>	Study Area Name	MOORE & LIBERTY TEL
<02D>	Program Year	2016
<03D>	Contact Name - Person USAC should contact regarding this data	Tom Campbell 1 6516218511 ext. tcampbell@octcpas.com
<03S>	Contact Telephone Number - Number of person identified in data line <03D>	
<03R>	Contact Email Address - Email Address of person identified in data line <03D>	

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... See attached worksheet

**(710) Broadband Price Offerings  
Data Collection Form**

FCC Form 481  
OMB Control No.  
July 2013

**(800) Operating Companies  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--

<010> Study Area Code	381622
<015> Study Area Name	MOORE & LIBERTY TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Toni Campbell
<035> Contact Telephone Number - Number of person identified in data line <030>	651 621 8511 ext .
<039> Contact Email Address - Email Address of person identified in data line <030>	tcampbell1@otcpas.com

<910> Tribal Land(s) on which ETC Serves
--

<920> Tribal Government Engagement Obligation

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select Yes or No Not Applicable	<input checked="" type="checkbox"/>	<input type="checkbox"/>					
---------------------------------------	-------------------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	381622
<015>	Study Area Name	MOORE & LIBERTY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpars.com

<110> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).  


<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).  


(1200) Terms and Condition for Lifeline Customers  
Lifeline  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July2013

<010>	Study Area Code	381622	MOORE & LIBERTY TEL
<015>	Study Area Name		
<020>	Program Year	2016	
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6516218311 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com	
		381622nd1210.pdf	
<1210> Terms & Conditions of Voice Telephony Lifeline Plans		Name of Attached Document	
<1220> Link to Public Website		HTTP	
<p>"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCS receiving low-income support, carriers must annually report:</p>			
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>	
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>	
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>	

<b>(2000) Price Cap Carrier Additional Documentation</b>	
<b>Data Collection Form</b>	
<b>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</b>	

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	381622
<015>	Study Area Name	MOORE & LIBERTY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	651-6218511 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcampbell1@otcpas.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community/Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation  
Data Collection FormFCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	381622
<015>	Study Area Name	MORE & LIBERTY TEL
<020>	Program Year	2016
<020>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<030>	Contact Telephone Number - Number of person identified in data line <030>	651628511 ext.
<030>	Contact Email Address - Email Address of person identified in data line <030>	t.campbell1@otccpa.com

**CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.**

(3010) <b>Progress Report on 5 Year Plan</b> Milestone Certification [47 CFR § 54.313(f)(1)(ii)]	Name of Attached Document Listing Required Information  381622nd3010.pdf
<p>Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.</p>	
<input checked="" type="checkbox"/>	
(3012) Community Anchor Institutions [47 CFR § 54.313(f)(1)(ii)]	Name of Attached Document Listing Required Information  381622nd3012.pdf
<p>Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:</p>	
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	
(3013) Is your company a Privately Held ROR Carrier [47 CFR § 54.313(f)(2)]	Name of Attached Document Listing Required Information  381622nd3017.pdf
(3014) If yes, does your company file the RUS annual report	(Yes/No)  ○○○○
<p>Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:</p>	
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	
(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	
(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
<p>If the response is no on line 3014, is your company audited?</p>	
<p>If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains</p>	
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	
(3019) Either a copy of their audited financial statement; or (2) a financial report, in a format comparable to RUS Operating Report for Telecommunications Borrowers,	
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	
<p>(3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit contains:</p>	
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	
(3022) Copy of their financial statement, which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	
<p>(3023) Underlying information subjected to a review by an independent certified public accountant</p>	
<p>(3024) Underlying information subjected to an officer certification.</p>	
<p>(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows</p>	
<p>(3026) Attach the worksheet listing required information</p>	

(3000) Rate Of Return Carrier Additional Documentation (Continued)  
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	381622
<015>	Study Area Name	MORE & LIBERTY TEL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035>	Contact Telephone Number - Number of person identified in data line <030>	656218511 ext.
<035>	Contact Email Address - Email/Address of person identified in data line <030>	t.campbell@otccpas.com

**Financial Data Summary**

(3027) Revenue	2992019
(3028) Operating Expenses	3190235
(3029) Net Income	352055
(3030) Telephone Plant In Service(TPIS)	15363699
(3031) Total Assets	12157084
(3032) Total Debt	4818468
(3033) Total Equity	5685165
(3034) Dividends	0

**Certification - Reporting Carrier  
Data Collection Form**FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	381622
<015> Study Area Name	MOORE & LIBERTY TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035> Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	381622
<015> Study Area Name	MOORE & LIBERTY TEL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Tom Campbell
<035> Contact Telephone Number - Number of person identified in data line <030>	6516218511 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tcampbell@otcpas.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>Tom Campbell</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Tom Campbell
Name of Reporting Carrier:	MOORE & LIBERTY TEL
Signature of Authorized Officer:	CERTIFIED ONLINE
Date: 06/25/2015	
Printed name of Authorized Officer:	Tyler Kilde
Title or position of Authorized Officer:	Vice President
Telephone number of Authorized Officer:	7014373417 ext.
Study Area Code of Reporting Carrier:	381622
Filing Due Date for this form: 07/01/2015	
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	MOORE & LIBERTY TEL
Name of Authorized Agent or Employee of Agent:	Tom Campbell
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE
Date: 06/25/2015	
Printed name of Authorized Agent or Employee of Agent:	Tom Campbell
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	6516218511 ext.
Study Area Code of Reporting Carrier:	381622
Filing Due Date for this form: 07/01/2015	
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED - FOR PUBLIC INSPECTION

Attachments



REDACTED - FOR PUBLIC INSPECTION

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July, 2013

REDACTED - FOR PUBLIC INSPECTION

**(800) Operating Companies  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

SAC: 381622

State: ND

Moore & Liberty Tel

Form 481 Line No. 112 Five Year Service Quality Improvement Plan

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**ATTACHMENT REDACTED IN ENTIRETY**

REDACTED - FOR PUBLIC INSPECTION

SAC: 381622

State: ND

Moore & Liberty Tel

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

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1. Moore & Liberty Tel Company (Company) will provide service on a timely basis to requesting customers within the Company's designated service area where the Company's network already passes the potential customers premises, and
  
2. The Company will provide service, within a reasonable period of time, if the potential customer is within the Company's designated service area but outside the Company's existing network coverage, if the service can be provided at reasonable cost by:
  - a. Modifying or replacing the requesting customers equipment;
  - b. Deploying a roof-mounted antenna or other equipment;
  - c. Adjusting the nearest cell tower;
  - d. Adjusting network or customer facilities;
  - e. Reselling services from another carrier's facilities to provide service; or
  - f. Employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment.

### 3. Service Quality Standards

The Company:

- Provides voice grade access to the public switched network.
- Provides flat rated local exchange service with no addition charge to end users.
- Provides access to the emergency services provided by local government or other public safety organization, such as 911 and enhanced 911.
- Provides toll blocking and toll limitation services.
- Advertises the availability of its services and the charges using media of general distribution and on its website.
- Maintains a business office providing customers with access to a customer service representative either in person or via a local telephone call or toll-free telephone number during normal business hours.
- Directs after hour calls to the Company's help desk.
- Directs trouble reports to the on-call technician.
- Tracks all service orders to ensure they are completed in a timely manner.
- Measures its service connection and service interruption performance on a regular basis.
- Trains employees to:
  - Answer all incoming calls promptly.
  - Respond to all inquiries for information promptly and courteously.
  - Investigate thoroughly all customer complaints.
  - Be knowledgeable about products and service offerings so they can assist the customer with selecting the best service option.
- Has a process for periodic inspection, testing and preventive maintenance of its equipment to permit the rendering of safe, adequate and continuous service at all times.

SAC: 381622

State: ND

Moore & Liberty Tel

Form 481 Line No. 510 Compliance with Service Quality Standards and Consumer Protection

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4. Consumer Protection Rules

The Company has established operating procedures designed to facilitate compliance with applicable consumer protection rules which include compliance with the Customer Proprietary Network Information (CPNI) rules. The operating procedures include:

- Appointment of a compliance officer.
- A manual detailing the specific procedures for protecting consumer information.
- Employee training on an annual basis.
- A disciplinary process for improper use of consumer information.

SAC: 381622

State: ND

Moore & Liberty Tel

Form 481 Line No. 610 Description of Functionality in Emergency Situations

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Moore & Liberty Tel has:

- Established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, or from fire, storm, or acts of God including provisions for emergency power that provide:
  - A minimum of four hours of battery service in each central office.
  - A permanently installed power unit in exchanges, or
  - Mobile power units that can be delivered on short notice and which can be readily connected in offices without installed emergency power facilities.
  
- Informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power, in the event of emergency in order to prevent or mitigate interruption or impairment of telecommunications service.

SAC: 381622

State: ND

Moore & Liberty Tel

Form 481 Line No. 1010 Descriptive document for Voice Services Rate Comparability

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Line 1010 – Description of Voice Services Rate Comparability: Provide a detailed description of how your pricing of fixed voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. § 54.313(a)(10).

On April 16, 2015 the Wireline Competition Bureau announced results of the Urban Rate Survey for Voice Services as part of FCC Public Notice DA 15-470. Referenced in this public notice are the results required to meet the rate comparability as noted:

"Based on the survey results, the reasonable comparability benchmark for voice services is \$47.48.<sup>3</sup>

<sup>3</sup> Id. at 17694, para. 84."

As required Moore & Liberty Tel hereby certifies that its current fixed voice services for residential subscribers as defined in the USF/ICC Transformation Order is below \$47.48.

SAC: 381622

State: ND

Moore &amp; Liberty Tel

Form 481 Line No. 1210 Lifeline Plans Terms and Conditions

**Lifeline Terms and Conditions**

1. Moore & Liberty Tel (Company) offers lifeline program-supported service to qualified low-income residential consumers for one telephone line per eligible household. The lifeline program provides discounts to eligible low-income consumers to help them establish and maintain telephone service. Lifeline assistance lowers the cost of basic, monthly local telephone service. Eligible consumers can receive \$9.25 per month in discounts. In addition, the Federal Universal Service Charge is not assessed to consumers participating in Lifeline. Toll Blocking prevents the placement of all long distance calls for which a subscriber would be charged. Toll Blocking is available to eligible consumers at no cost. Also, by choosing the option, consumers are usually not charged a deposit.

**Lifeline Program Eligibility Information****Program Based Eligibility**

Consumers are eligible for Lifeline if they, one of their dependents or their household participate in one of the following qualifying assistance programs:

Low Income Home Energy Assistance Program (LIHEAP)  
 Federal Public Housing Assistance (Section 8)  
 Supplemental Nutrition Assistance Program (SNAP)  
 Medicaid  
 National School Lunch Program (NSLP) and receives lunch through the program  
 Supplemental Security Income (SSI)  
 Temporary Assistance for Needy Families (TANF)

Lifeline applicant must present documentation demonstrating eligibility either through participation in one of the qualifying federal assistance programs or through income-based means.

Acceptable documentation of program-based eligibility includes: current or prior year's statement of benefits from a qualifying program; notice letter of participation in a qualifying program; program participation documents; or another official document evidencing the consumer's participation in a qualifying program.

**Income Based Eligibility**

In addition, consumers are eligible for Lifeline if their household income is at or below 135% of the federal poverty guidelines.

## 2014 Federal Poverty Guidelines – 135%

<b>Household Size</b>	<b>48 Contiguous States and D.C.</b>
1	\$ 15,755
2	21,236
3	26,717
4	32,198
5	37,679
6	43,160
7	48,641
8	54,122
For Each Additional Person, Add	5,481

Acceptable documentation of income eligibility includes: prior year's state, federal or Tribal tax return; current income statement from an employer or paycheck stub; social security statement of benefits; Veterans Administration statement of benefits; retirement/pension statement of benefits; unemployment/workmen's compensation statement of benefits; federal or Tribal notice of letter participating in General Assistance; or a divorce decree or child support award or other official document containing income information.

SAC: 381622

State: ND

Moore & Liberty Tel

Form 481 Line No. 1210 Lifeline Plans Terms and Conditions

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### **Lifeline Terms and Conditions (Continued)**

#### **Lifeline Program Eligibility Information (Continued)**

##### **Recertification of Lifeline Eligibility**

Lifeline recipients are required to recertify their eligibility annually. Failure to properly recertify a recipient's continued eligibility for the Lifeline program will result in termination of the Lifeline recipient's monthly Lifeline discount and de-enrollment from the Lifeline Program.

##### **Additional Lifeline Program Information**

The Lifeline program is limited to one benefit per household, consisting of either wireline or wireless service. A household is defined, for purposes of the Lifeline Program, as an individual or group of individuals who live together at the same address and share income and expenses. Lifeline is government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

2. The Local services for (Company) that serve as its Lifeline Plans are in Compliance with the Essential telecommunications service as specified in North Dakota Chapter 49-21 4.c as follows:
  - C. Primary flat rate residence basic telephone service including the following service elements:
    - 1) Billing and collecting of the telecommunications company's charges for the service
    - 2) Primary directory listing
    - 3) Access to assistance
    - 4) Access to emergency 911 service and emergency operator assistance in the local exchange areas in which emergency 911 service is not available
    - 5) Except as provided in section 49-02-01.1, mandatory, flat-rate extended area service to designated nearby local exchange areas.
    - 6) Transmission service necessary for the connection between the end user's premises and the local exchange central office switch including a trunk connection that has inward dialing and necessary signaling service such as touchtone used by end users for service.
  3. The Company's flat rate plans include unlimited local exchange calling including usage to designated nearby local exchange areas. The flat rate plans do not include any toll usage. The rates for any toll usage are determined by the rate plans of the Toll Provider(s) that are selected by lifeline end users.
  4. The Company has met and will meet the requirements of eligible telecommunications carrier advertising. This includes:
    - a. A full description of available services in the Company's Official telephone directory, including the process to be used by customers to qualify for lifeline and link-up service.
    - b. Advertising of the available universal service in media of general circulation in the Company's designated service area. Availability may be advertised in newspapers, company newsletters, company or civic internet sites, bill stuffer, direct mailings, or other means intended to convey availability throughout the designated service area.
  5. The specific Company terms and conditions for the Companies Lifeline Plans are set forth in pages included in Exhibit 1, attached.

SAC: 381622

State: ND

Moore & Liberty Tel

Form 481 Line No. 1210 Lifeline Plans Terms and Conditions

## REDACTED - FOR PUBLIC INSPECTION

### MLGC 4PACK BUNDLE

Combine these four popular services at one low rate at saves you more than \$85 each month.  
The MLGC 4Pack Bundle includes:

**Residential Local Telephone** including Voicemail with Email Notification, Caller ID, Call Waiting, Call Forwarding and 3-Way Calling

**Long Distance Telephone (1,200 minutes)**

**20 Mbps Internet**

**E-Basic Cable TV**

#### COMPARE AND SAVE

##### MLGC 4Pack Bundle Pricing\*\*

Individual Retail Pricing

\$201.72/month

Savings of

\$86.73/month

\*Some restrictions apply \*\*Excluding taxes and FCC charges

#### TELEPHONE

##### MONTHLY TELEPHONE CHARGES

Local Residential Service

\$18.25

Local Business Service

\$24.25

#### CALLING FEATURE RATES

Caller ID

\$5.00

Caller ID with Call Waiting

\$8.00

Call Forwarding

\$2.10

Call Waiting

\$3.00

3-Way Calling

\$3.00

Inside Wire

\$1.00

Voice Mail with Email Notification

\$3.50

#### TELEPHONE INSTALL FEE

Installation Fee

\$25.00

#### ND LONG DISTANCE RESIDENTIAL RATES

In-State

\$0.10/min

State-to-State

\$0.10/min

Canada

\$0.10/min

In-State

\$0.15/min

Canada

\$0.12/min

#### ND LONG DISTANCE BUSINESS RATES

10c Nationwide Plus (\$4.95/month)

In-State

\$0.10/min

State-to-State

\$0.10/min

Canada

\$0.10/min

In-State

\$0.14/min

State-to-State

\$0.08/min

Canada

\$0.12/min

#### INTERNET

##### RESIDENTIAL

5 Mbps/1 Mbps

\$35.99/month

10 Mbps/1.5 Mbps

\$55.99/month

20 Mbps/2 Mbps

\$93.99/month

##### BUSINESS

5 Mbps/1 Mbps

\$45.99/month

10 Mbps/1.5 Mbps

\$65.99/month

20 Mbps/2 Mbps

\$105.99/month

#### WITH PHONE

##### WITHOUT PHONE

5 Mbps/1 Mbps

\$75.99/month

10 Mbps/1.5 Mbps

\$95.99/month

20 Mbps/2 Mbps

\$135.99/month

#### CABLE TV

##### MONTHLY CABLE TV RATES

E-Basic Cable TV (Channels 2-78)

\$47.93

Digital Tier\*\* (Digital, Music and HD Channels)

\$19.95

HBO\*\*

\$18.00

Showtime/TMC/Flix\*\*

\$16.00

Cinemax\*\*

\$10.00

Starz/Encore\*\*

\$16.00

All 4 Premiums\*\*

\$46.00

DVRHD Receiver Lease

\$9.00

HD Receiver Lease

\$5.00

Cable Card Lease

\$2.50

Installation Fee

\$40.00

Prices exclude taxes and FCC charges

Prices exclude taxes and FCC charges

\*\*Video equipment is required to view programming

Prices exclude taxes and FCC charges

6/28/2013

SAC: 381622

State: ND

Moore & Liberty Tel

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

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Moore & Liberty Tel hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

SAC: 381622

State: ND

Moore & Liberty Tel

Response to Line 3012 – Progress Report on 5 Year Plan – Community Anchor Institutions (47 CFR  
§54.313(f)(1)(ii))

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Moore & Liberty Tel has no newly served community anchor institutions that began receiving broadband in the preceding calendar year.

SAC: 381622

State: ND

Moore & Liberty Tel

Form 481 Line No. 3017 RUS Annual Report

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**ATTACHMENT REACTED IN ENTIRETY**